

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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STEPHEN LEE AND SUFFOLK INDEPENDENT LIVING  
ORGANIZATION,

*Plaintiffs,*

-against-

ROYAL ATLANTIC CORPORATION ET AL.,

*Defendants.*

Honorable Judge  
Leonard D. Wexler  
03-Civ-2494 (LDW/)


**MEMORANDUM OF  
LAW IN SUPPORT OF  
DEFENDANTS' \*\*  
CROSS MOTION FOR  
SUMMARY  
JUDGMENT AND IN  
OPPOSITION TO THE  
PLAINTIFFS' MOTION  
FOR PARTIAL  
SUMMARY  
JUDGMENT**

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**STATEMENT**

Defendants, HENRY V. WHITE, KIM M. WHITE, WALTER LARKIN,  
JACQUELINE GIORGIO, FRANK GIORGIO, SCOTT SCHRAGER, ANN DESIMONE  
AND KEVIN DESIMONE, adopt and incorporate by reference the Memorandum of Law  
in Support of Defendants Cross-Motion for summary Judgment and in opposition to the  
Plaintiffs' Motion for Partial Summary Judgment submitted by Alan M. Cane, Esq. as  
said defendants' Memorandum of Law.

Dated: July 13, 2012

Yours, etc.

  
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**\*\* Defendants: HENRY V. WHITE, KIM M. WHITE, WALTER LARKIN, JACQUELINE  
GIORGIO, FRANK GIORGIO, SCOTT SCHRAGER, ANN DESIMONE AND KEVIN  
DESIMONE\*\***